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UNITED STATES GENERAL ACCOUNTING OFFICE
WASHINGTON, D.C. 20548

MANPOWER AND WELFARE
DIVISION

B-164031(1)

JUL 19 1973

The Honorable
The Secretary, Department of Health, Education, and Welfare



Dear Mr. Secretary:

The Federal Personnel and Compensation Division of the General Accounting Office, as part of its overall plan to review training and education programs for civilian employees in the Federal Government, completed a limited survey of these programs in the Department of Health, Education, and Welfare (HEW) and in its constituent agencies, including the Office of the Secretary. Our survey disclosed that there is a need to strengthen the role of the Office of Personnel and Training in providing leadership and guidance to insure that HEW systematically develops plans and programs for training and evaluates the extent to which such programs are achieving their intended objectives.

In April 1973, we prepared a statement of conditions and conducted structured briefings with HEW officials to present the details of our findings. We believe the following information will be of value to you in formulating current plans for reorganizing and realining training programs and in considering whether HEW has sufficient staff for appropriately emphasizing the training function.

BACKGROUND

The Federal Personnel Manual requires each agency to develop written policies to govern the training of agency employees. The manual requires the head of each agency to take administrative action to insure that

--plans and programs are developed to meet agency short- and long-range training needs,

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--priorities are established for agency training programs, and

--provision is made for using funds and manhours, in accordance with established priorities, for agency training programs.

The manual also requires agencies to carefully analyze and evaluate results and effects of training programs to determine if they are contributing effectively toward achieving agency missions and attaining management goals.

Federal agencies are required by law to submit annual reports to the Civil Service Commission on their programs and plans for training employees. In fiscal year 1972, HEW reported that a total of \$18 million was expended on training for Federal civilian employees. This amount does not include salary costs of personnel trained.

POLICY AND GUIDANCE

The Office of Personnel and Training (OPT) in the Office of the Secretary is responsible for developing and issuing policy and guidance in personnel administration. Constituent agencies, to varying degrees, also issue policy and guidance, but only the Social Security Administration had issued current extensive policy at the time of our survey.

In April 1972, the policymaking and procedure function was separated from other operational training functions in HEW and is currently under three employees. HEW officials informed us that they are considering a reorganization plan which would transfer some of these employees to other functional areas having higher priorities. They also informed us early in our survey that HEW's general training policy, which had not been updated since 1965, was obsolete. On April 13, 1973, OPT issued new policy guidelines governing HEW's management of training programs.

We believe OPT has made some progress to improve its role in providing leadership and guidance to the agencies

in managing training programs since separating policymaking and procedure from other functions. This has provided more visibility to training and has resulted in updating training policy guidelines.

PLAN FOR TRAINING

The Civil Service Commission requires each agency to review its training needs at least annually in a planned and systematic manner. Records are to be maintained showing the date of the review, procedures used, and findings and recommendations for subsequent use in planning and evaluating the training program.

Our review disclosed that training plans, based on formal reviews of needs, were not prepared in the Office of the Secretary nor in four of the agencies--Social Security Administration, Health Services and Mental Health Administration, National Institutes of Health, and the Social and Rehabilitation Service. Two agencies--the Office of Education and the Food and Drug Administration--prepared plans primarily on the basis of prior year's training experience and did not fully consider Civil Service Commission requirements. 55
148

Agencies did not have a systematic method for insuring that many categories of training were related to needs, to departmental or agency missions, or to present or planned job duties. We did find, however, that certain skills training required by employees to perform basic job duties was related to needs. Officials informed us that skills training can represent nearly one-half of the training in HEW.

Agencies also lacked specific criteria to enable them to make need determinations in an objective manner, except in those cases where the need for training is mandated or is a prerequisite for job performance. Agencies relied more on informal and subjective need determinations rather than on systematic annual reviews. We found that training-need determinations ranged from mandates by Civil Service Commission regulations establishing requirements to situations where the employee determines his own training needs.

We found no consistent approach within the various agencies regarding the relationship of training to current or future official duties because, in our opinion, agencies lacked a systematic method for determining training needs. There has been confusion at the agency level as to whether training had to be related in any way to job duties since individual training courses provided under HEW's upward mobility program were not required to be job related. This seems to have contributed to the various agency interpretations and approaches to this matter.

CURRICULUM AND COURSE DEVELOPMENT

HEW needs to give more attention to developing curriculums and courses (i.e., supervisory and managerial) to satisfy training needs that are common to its constituent agencies. Certain agencies have developed in-house training curriculums and courses, primarily skill-types, that are required for basic job performance for employees, including food and drug inspectors and claims adjudicators and examiners. The agencies, however, have had little success in developing courses for training that are not prerequisites for job performance. In our opinion, success has been limited because (1) need determinations were not systematically made and (2) management had not given it sufficient attention.

EVALUATION OF TRAINING

Because HEW did not evaluate training as required by the Federal Personnel Manual, it did not know the extent to which training objectives were met nor the extent to which training contributed effectively toward achieving agency missions and attaining management goals. If needs are not systematically determined, it is difficult, in our opinion, to assess whether training objectives are met. Departmental and agency officials indicated that training is not evaluated primarily because of a lack of criteria on which to measure results.

HEW has plans to carry out a series of research studies to develop new procedures for determining training needs and evaluating training results. For example, a pilot study is

B-164031(1)

underway to determine the feasibility of including provisions for evaluations in future course development contracts. Also, HEW plans to establish constituent agency study groups to review current developments in the field of training technology and methodology.

ANNUAL REPORTING OF TRAINING

Government agencies are required by law to submit annual reports to the Civil Service Commission on their programs and plans for training employees, including information on (1) number of participants and participant manhours in agency training activities categorized as internal, interagency, and non-Government and (2) training expenses, including salary costs of all personnel engaged in training activities except participants. OPT gathers this information from each of the constituent agencies and forwards a summary of it to the Civil Service Commission.

HEW, the Civil Service Commission, and the Congress may be relying and making decisions on erroneous data because HEW's annual training report was inaccurate and incomplete.

ACTIONS TAKEN OR PLANNED BY ACTING DEPUTY ASSISTANT SECRETARY FOR PERSONNEL AND TRAINING

On April 25, 1973, we discussed the details of our survey findings with the Acting Deputy Assistant Secretary for Personnel and Training and his staff. They generally agreed with the problem areas discussed in this letter. At that time, we also recognized that new policies and procedures had been developed and issued which, in our opinion, if implemented and enforced, could effectively improve the administration of Department-wide training. However, we also believe there was a need for an action plan to identify how the Department intended to implement and enforce the revised policies and procedures.

In response to our request, the Acting Deputy Assistant Secretary, on May 4, 1973, furnished us with a comprehensive training action plan for implementing and enforcing revised

policies and procedures to enhance the effectiveness of the administration and management of training. The plan established responsibilities and standards in the areas of training needs, training plan development, evaluation, reporting, and program review. It also included procedures to correct certain deficiencies noted during our survey.

CONCLUSIONS AND RECOMMENDATIONS

HEW needs to provide more guidance over the general administration and management of training. The newly issued policy and the training action plan are two necessary steps toward achieving an equitable and meaningful training program for HEW.

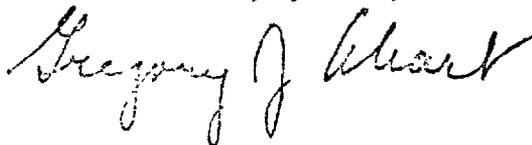
The actions planned or taken by the Acting Deputy Assistant Secretary could result in needed management improvements. However, in view of (1) the reorganization plan under consideration which may reduce the number of employees responsible for the training policy and procedures function and (2) the comprehensive plan to implement and enforce the newly issued policy, we recommend that you review whether HEW has sufficient staff to fully implement these steps and to develop new techniques and procedures to better manage the training function in HEW. We plan to follow HEW's actions in making improvements and in examining future training and upward mobility programs.

Copies of this report are being sent to the Director, Office of Management and Budget; the Chairmen of the Senate and House Committees on Appropriations, Post Office and Civil Service, and Government Operations; the Chairman of the Intergovernmental Relations Subcommittee; and to Congressman L. H. Fountain pursuant to his request.

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Sincerely yours,



Gregory J. Ahart
Director